

PLANNING, DESIGN AND ACCESS STATEMENT

Land off Wrexham Road, Abermorddu

Prepared on behalf of

The Applicant – Castle Green Homes

September 2022

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1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Castle Green Homes (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”) submitted to Flintshire County Council for the proposed development of Land off Wrexham Road Road in Abermorddu (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought comprises the following:

“Erection of 70 dwellings, construction of a new vehicular access, landscaping and associated works”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement as documented in *Table 1* below:

Table 1: Application Package

Technical Report	Author	Reference / Date
Location Plan	Castle Green Homes	ABMRD-LP.01
Site Layout	Castle Green Homes	ABMRD-SP.01 Rev. B
House Types	Castle Green Homes	Various
Topographical Survey	Powers and Tiltman	7558/01
Landscape Plans	Ascerta	P.1542.21.03 and P.1542.21.04
Transport Statement	SCP	August 2022
Arboricultural Impact Assessment	Ascerta	September 2021 (updated October 2021)
Flood Consequences Assessment and Drainage Strategy	Coopers Consulting Engineers	August 2022
Preliminary Ecological Appraisal	CES Ecology	January 2022

- 1.5. The Applicant has sought pre-application guidance on the proposed development from Flintshire County Council, which was issued in April 2021. This guidance has been taken into account in the preparation of this Application.

- 1.6. Moreover, in accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation for the proposed 'major' development (by virtue of its scale in excess of ten dwellings).
- 1.7. To guide this process, the Applicant has established a dedicated website on which to make details of the proposed development and the aforementioned Application documentation available to view <https://planning.castlegreenhomes.uk>. In accordance with the statutory guidelines, the Applicant has also issued formal correspondence to consultees and adjoining landowners, and advertised/displayed detailed of the Application by way of a site notice. Further details, including the feedback/comments received and how these have been addressed by the Applicant, will be documented in the Pre-Application Consultation Report submitted with the Application.

2 SITE CONTEXT

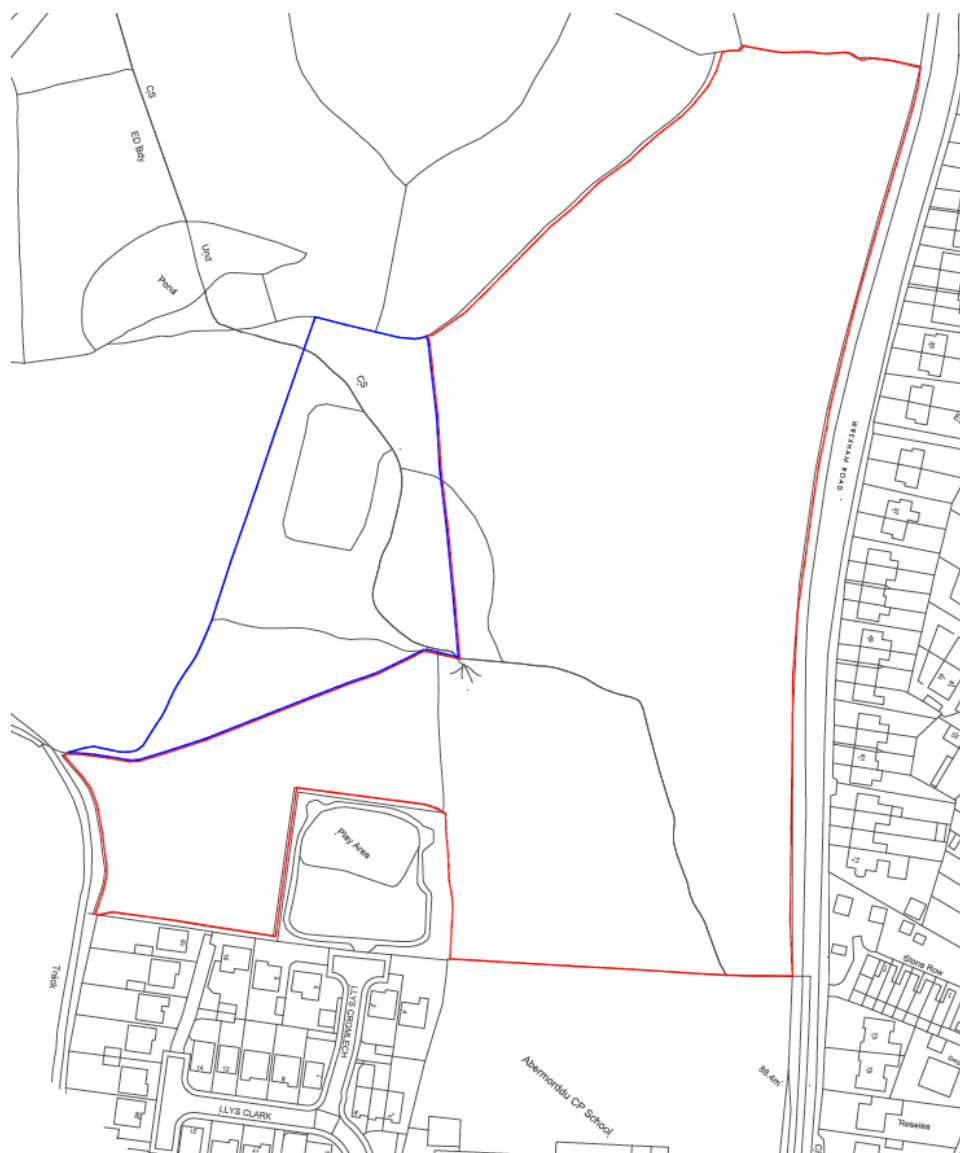
2.1. This Section of the Statement provides details of the Site, namely its location, description, and locational sustainability.

Site Location

2.2. The Site lies within the administrative area of Flintshire County Council.

2.3. The location plan of the Site is provided at *Figure 1* below:

Figure 1: Location Plan



Source: Site Location Plan Drawing Ref. ABMRD-LP.01

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- 2.4. The Site is located at the western edge of the settlement of Abermorddu, which is identified as a Semi-Urban / Main Village in Flintshire County Council's adopted Unitary Development Plan. Together with the nearby settlements of Hope and Cefn-y-bedd, it has a population of approximately 4,487 (based on 2011 Census data).
 - 2.5. As a settlement, it benefits from good connectivity to Mold, Buckley, Wrexham and Chester via the highway network.
 - 2.6. In respect of its surroundings, the eastern boundary of the Site is formed by Wrexham Road, with existing residential development (and the main settlement area of Abermorddu) lying beyond.
 - 2.7. To the north and west of the Site lies undeveloped countryside. This partly comprises the Caeau Abermorddu Wildlife Site, a small part of which extends within the western part of the Site.
 - 2.8. To the south of the Site lies Abermorddu County Primary School (and the southern boundary adjoins the school playing field); an existing housing development at Llys Clark lies to the south-west of the Site, together with an existing equipped area of play.
 - 2.9. There are existing and well-established hedgerows at the boundaries of the Site which provide for a strong sense of containment; these lend the Site to development. The existing landscape features will be retained as much as possible, albeit some removal is required to facilitate the proposed development as documented later in this Statement. Compensatory planting will be provided as part of the proposed development as shown on the submitted Landscape Plans.

Site Description

- 2.10. The net Site area extends to 2.06 hectares (gross 4.27 hectares). It comprises two agricultural fields used for grazing purposes; these are divided by existing hedgerows/vegetation.
- 2.11. Vehicular access to the Site is currently available via a lawful access off Wrexham Road, along the eastern boundary. Future access into the Site will be provided via the creation of a new access further south along Wrexham Road designed to adoptable standards. This section of Wrexham Road lies within the already established 40mph speed zone with street lighting and footways to facilitate safe pedestrian movements (it changes to 30mph heading southbound past Abermorddu County Primary School).
- 2.12. The undulating topography of the Site has been taken into account in the preparation of the Proposed Site Plan.
- 2.13. The Site lies wholly within Flood Zone A and thus is deemed to be at low risk of flooding. There is an existing watercourse which runs south-east through the southern part of the Site.

- 2.14. The Site is not located within a Conservation Area.
- 2.15. There are no listed buildings on or immediately adjacent to the Site.
- 2.16. The nearest heritage assets to the Site are:
- **Caergwrle Castle**, a Grade I listed building located c. 280m beyond the northern boundary of the Site, lying to the north-east;
 - **Plas-yn-Bwl**, a Grade II* listed building located c. 370m beyond the northern boundary of the Site; and
 - **Gatepiers at Bryn Lorcyn Manor**, a Grade II listed building located c. 480m beyond the western boundary of the Site.
- 2.17. There will remain a physical and visual separation between the northern-most boundary of the Site and these heritage assets post-development (owing to intervening vegetation, topography, landform/land-uses and the proposed layout). Accordingly, it is not considered that the proposed development of the Site would cause harm to the setting and significance of these heritage assets.
- 2.18. There is limited tree coverage within the Site, save for some established hedgerows. The Site boundaries currently comprise hedgerows and a small number of trees as shown on Drawing Ref. P.1542.21.01 Rev. A included at Appendix A of the accompanying Arboricultural Impact Assessment (AIA). There are no Tree Preservation Orders on the Site as confirmed in Section 3.4 of the AIA.
- 2.19. There is an existing footpath along the eastern boundary of the Site on Wrexham Road. The proposed new Site access will comprise 2m footways to provide a safe connection to the existing footway network to the east (which is the direction that the majority of people will travel for local services). There is an existing Public Right of Way beyond the western boundary of the Site, and the Proposed Site Plan illustrates a potential connection to this from the Site.
- 2.20. Existing overhead cables cross the northern part of the Site; these services will be relocated underground as part of the proposed development.

Locational Sustainability

- 2.21. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services. Further details are provided in Section 4 of the accompanying Transport Statement.

Access to Education

- 2.22. The catchment Primary School to the Site is Abermorddu County Primary School located to the immediate south of the Site, within a very short walking distance along Wrexham Road and Cymau Lane. The proposed footpath connections from the Site linking to the existing footpath on Wrexham Road will provide for safe pedestrian movements to and from the Site to the School and the wider area.
- 2.23. The nearest Secondary School to the Site is Castell Alun High School located in the nearby settlement of Hope. This is situated on Fagl Lane, within a c. 2.3km distance of the Site (heading north).
- 2.24. Overall, the Site benefits from excellent access to primary and secondary education, and which is accessible via sustainable modes of travel.

Access to Shops and Services

- 2.25. The nearest shops to the Site, for everyday goods, are located in nearby Caergwrle, located c. 0.8km to the north of the Site along Wrexham Road. This includes convenience stores (Costcutter and SPAR), butchers, bakery and florists. Other services include post office services/cash facilities (at SPAR), pharmacies and hair salons, restaurants/take-aways, public houses, petrol filling station and places of worship.
- 2.26. These facilities are accessible on foot, cycle, and via public transport and private car.
- 2.27. Overall, the Site benefits from good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

- 2.28. The nearest bus stop to the Site is located immediately adjacent to the eastern boundary on Wrexham Road (for southbound services), within a short walking distance. Bus stops serving both directions can be found on the A550 that can again be accessed on foot. The bus services which serve the settlement are LT7, LT8, 27 and 29, providing a good frequency of bus service and access to locations including Wrexham, Synallt, Leeswood and Mold amongst others.
- 2.29. There is no railway station in Abermorddu; however, it benefits from excellent access to nearby rail facilities in both Caergwrle (c. 1.1km) and Cefn-y-bedd (c. 0.7km). These provides hourly weekday off-peak services to Bidston and to Wrexham Central from where onward connections can be made.

Local stops on this route include Hope, Penyffordd and Buckley. A reduced service operates in the evening, weekends and bank holidays.

- 2.30. Further details of public transport services can be found in Section 4 of the accompanying Transport Statement.

Access to Healthcare

- 2.31. There are existing medical centres/GP practices and dental surgeries in nearby Caergwrle/Hope to provide healthcare services to local residents.

Access to Leisure / Recreation

- 2.32. Hope Sports Centre lies c 2.3km north of the Site in the nearby settlement of Hope. This provides access to a fitness suite, sports hall, gymnasium, 3G pitch; squash courts and grass pitches.
- 2.33. Other sports provision can be found at the Gwyn Evans Leisure and Activity Centre in Heol Cefn, Gwersyllt c. 4.8km south of the Site.
- 2.34. The nearest existing equipped area of play to the Site can be found to the immediate south-west, off Lllys Clark. This will be made accessible from the Site as part of the proposed development through the creation of a potential new footway connection.
- 2.35. Within the wider area, the Alyn Waters Country Park lies c.2.3km south-east of the Site.
- 2.36. The Waun-Y-Llyn Country Park lies c. 3.2km to the north-west of the Site.
- 2.37. Overall, the Site enjoys excellent access to leisure and recreation facilities within an accessible distance, and which together offer a significant health and well-being benefit to future residents of the proposed development.

Summary

- 2.38. Overall, the Site benefits from excellent sustainability as confirmed in Section 4 of the accompanying Transport Statement. It's proposed housing allocation in the emerging Replacement Flintshire Local Development Plan, as documented later in Section 5 of this Statement, is a further demonstration of its suitability and sustainability for the proposed land-use and scale of development proposed as part of this Application.

3 PLANNING HISTORY

3.1. The Site has previously been the subject of the following planning applications:

- **Application Ref. 052895** – this detailed planning application sought retrospective planning permission for the creation of the existing agricultural access from Wrexham Road. It was approved by Flintshire County Council on 12th January 2015; and
- **Application Ref. 058163** – this outline planning application by The Clark Estate sought planning permission for the development of up to 80 no. dwellings. It was withdrawn on 24th August 2018.

3.2. This Application as submitted places no reliance on the previous planning applications submitted (and those approved) on the Site.

4 PROPOSED DEVELOPMENT

- 4.1. This Section of the Statement provides details of the proposed development for which detailed planning permission is now sought.

Use

- 4.2. This Application seeks detailed planning permission for the following:

“Erection of 70 dwellings, construction of a new vehicular access, landscaping and associated works”

Amount

- 4.3. The proposed development will comprise 70 no. dwellings (Use Class C3), including 21 no. affordable homes (30%).
- 4.4. There will be a sub-station located to the south of Plot 10, details of which are shown on Drawing Ref. ABMRD-SP.01 Rev. B submitted for approval.

Housing Mix, Density and Floorspace

- 4.5. The proposed development will comprise the following housing mix:
- 14 no. 2-bed mid-end terraced properties (Affordable Homes);
 - 6 no. 3-bed end terraced properties;(Affordable Homes);
 - 1 no. 3-bed end terraced corner property (Affordable Home);

 - 37 no. 3-bed properties (Open Market Homes); and
 - 12 no. 4-bed detached properties (Open Market Homes);
- 4.6. The affordable housing shall be provided on the following plots, as shown on Drawing Ref. ABMRD-SP.01 Rev. B:
- Plots 1 to 4;
 - Plots 5 to 8;
 - Plots 31 to 34;
 - Plots 35-38; and
 - Plots 44 to 48.

- 4.7. The proposed net density across the Site will be 33.92 dwellings per hectare.
- 4.8. The cumulative net footage across the Site will equate to 3,450.25 square metres per hectare. The total combined proposed floorspace will equate to 76,428 square feet.

Scale and Massing

- 4.9. The proposed dwellings will all be a maximum of two-storeys in height, reflective of the typical prevailing local character found on Wrexham Road to the east and the more recent Llys Clark development to the south-west.
- 4.10. The proposed mix of dwellings (as set out in paragraph 4.5 above) allows for a layout such that it does not create issues of massing which would be out-of-keeping with the local character.

Layout

- 4.11. The Proposed Site plan is shown on *Figure 2* below.

Figure 2: Proposed Site Plan



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- 4.12. The Proposed Site Plan has been designed as a sympathetic and logical extension to the settlement, to the west of Wrexham Road on a naturally contained parcel of land.
- 4.13. The Proposed Site Plan has taken account of the topographical changes across the land, such that all of the proposed dwellings will be no more than 2-storeys in height.
- 4.14. Plots 5 to 8 and 60 to 67 will positively address the Site frontage on to Wrexham Road (served via private drives off the new internal access road), whilst Plots 9 and 10 and 11-15 will positively address the proposed internal access road at the Site entrance.
- 4.15. The layout has been designed to provide for the efficient use of the land to deliver 70 no. new homes, with only a small number of private gardens backing on to any of the Site boundaries (Plots 1-4). This will protect the residential amenity and privacy of future residents, as well as existing nearby dwellings/land-uses, and prevent issues of overbearing and overlooking.
- 4.16. There is some proposed use of private driveways throughout the Site. These align with the Council's standards.
- 4.17. The affordable homes have been pepper-potted throughout the proposed development, and these properties will be indistinguishable in their appearance from the open market homes.
- 4.18. The house and plot sizes are reflective of the local character, incorporating a mix of terraced and detached properties.
- 4.19. The layout has respected the Council's required separation distances and has sought to avoid any issues of overlooking/loss of privacy consistent with the Council's spacing standards
- 4.20. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This includes the overlooking of the proposed public open space and footpath connections to the adjacent off-site equipped area of play from plots 5-8, 13-15, and 16-18.
- 4.21. Details of the street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.
- 4.22. The layout has sought to retain as many existing trees and hedgerows as possible, consistent with the Local Development Plan. However, in order to accommodate the proposed development, including the proposed Site access, a small number of trees and hedgerows (including just some partial loss) will need to be removed as documented in Table 1 of the accompanying AIA. Further details are also provided in Section 6 of this Statement. The loss of these trees will be compensated for through replacement planting as shown on the submitted Landscape Plans.

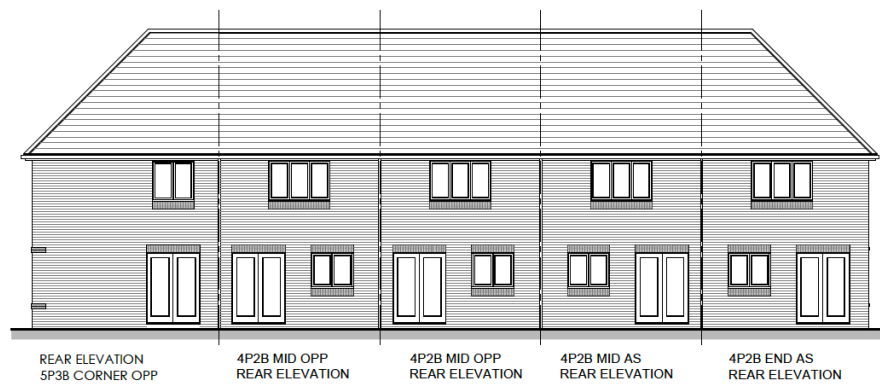
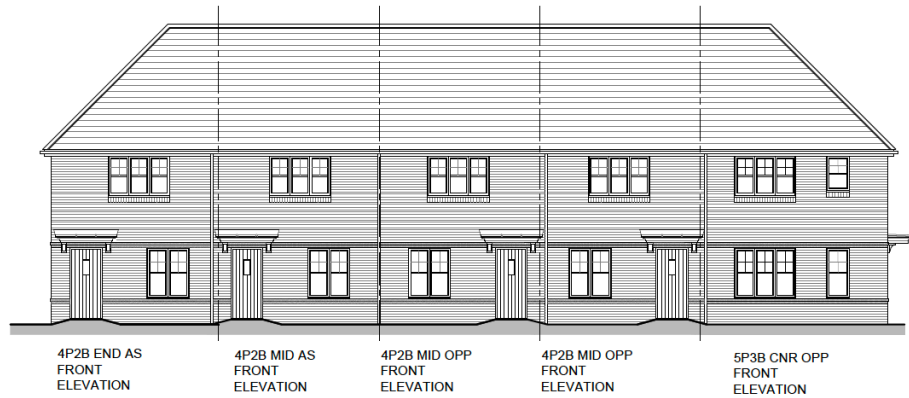
Materials and House Types

4.23. Figure 3 below provides examples of the proposed house types to be delivered across the Site; further details, including floorplans, are provided as part of the submitted drawing package.

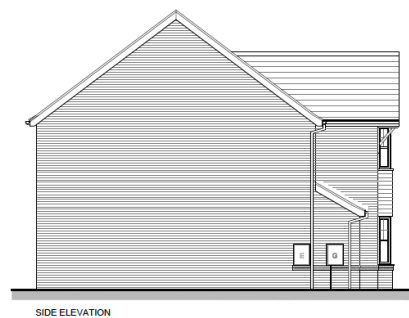
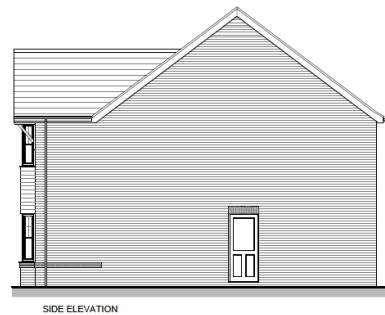
Figure 3: Proposed House Types



House Type: 4P2B 4 Block



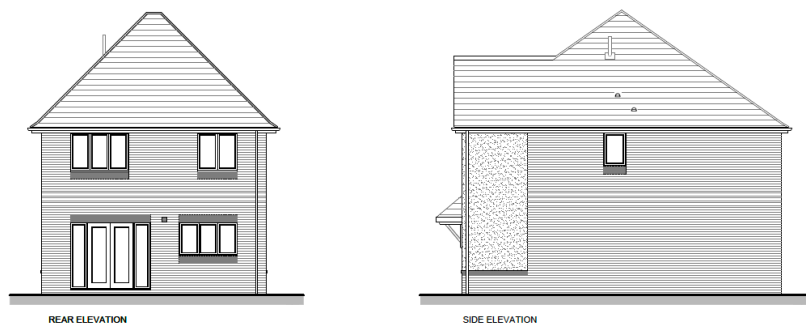
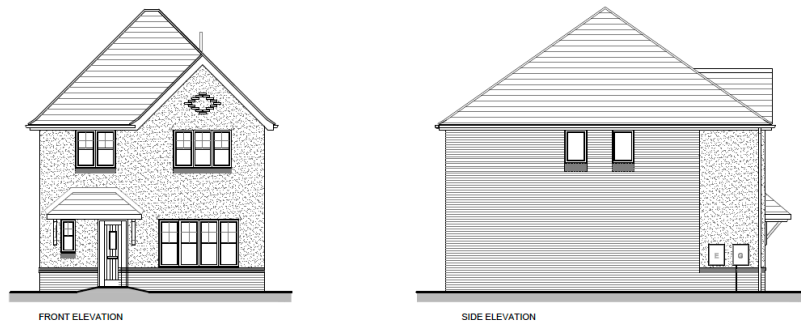
House Type: *BLOCK, 5CNR*



House Type: *Alderton*



House Type: *Beaumont*



House Type: *W.BUR*



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION

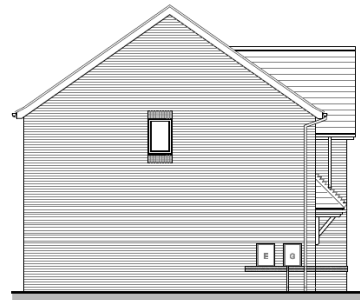


SIDE ELEVATION

House Type: *Henley*



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

House Type: *Marlow Semi*



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

House Type: *Oxford*



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

House Type: *Stratford*

House Type: *Wentworth*

- 4.24. The palette of materials proposed by the Applicant comprise facing brickwork with contrasting details and some render. Roof materials will likely include the use of slate-coloured concrete tiles. The palette of materials has been carefully considered with a view to ensuring a high-quality design which responds to the placemaking aspirations set out in the Local Development Plan (adopted and emerging) and PPW11.
- 4.25. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

- 4.26. Landscape plans (Drawing Ref.'s 1542.21.03 and 1542.21.04) have been prepared and are submitted with the Application; these illustrate the ability and commitment to provide new and compensatory tree and hedgerow planting across the Site. This will include native planting, ornamental planting, wildflower seeding, as well as turfed private gardens.
- 4.27. As documented earlier in this Statement, public open space will be provided in the southern parcel of the Site. This will include an attenuation basin as part of the surface water drainage strategy.

Footpath connections will be provided through this space from the Site to the adjacent equipped area of play that was delivered as part of the nearby Llys Clark residential development; accordingly, no additional equipped areas of play are proposed within the Site. The relationship between the proposed development, the proposed open space, and the existing equipped area of play is shown on Drawing Ref. ABMRD-SP.01 Rev. B submitted for approval.

- 4.28. The proposed boundary treatments include 1.8m high timber close boarded fences between properties, as well as a 1.8m high screen wall/fences between some of the plots (primarily on the corner plots) as delineated on the submitted Proposed Site Plan.

Accessibility

- 4.29. Vehicular (and pedestrian/cycle) access into the Site will be created from Wrexham Road. This will serve as the only point of access into the Site. The visibility splays at the proposed Site access will be 2.4m x 120m as shown on Drawing Ref. SCP/220529/F01 Rev. A provided at Appendix B of the accompanying Transport Statement.
- 4.30. The proposed access will include a 5.5m carriageway with a 2m internal footway on both sides of the road, designed to adoptable standards. The internal footways provided at the Site entrance will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement. This includes a connecting to the existing footway network on Wrexham Road, providing a safe and traffic free link to local Schools and services, including public transport.
- 4.31. In addition to connecting to Wrexham Road to the east of the Site, the proposed development will incorporate footpath connections to the existing equipped area of play which lies adjacent to the southern boundary, as well as providing a connection to the existing Public Right of Way to the west.
- 4.32. The road widths, including the features junction and private driveways, have been designed such that the proposed development is accessible via refuse vehicles and emergency vehicles. Swept path analysis has been undertaken to inform the proposed Site layout, details of which can be found in Section 3.6 and Appendix C of the accompanying Transport Statement.
- 4.33. The use of dropped kerbs and tactile paving will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all consistent with SPGN12.
- 4.34. The proposed development will comprise a mix of side and front off-road parking consistent with the Council's standards set out in SPGN11. Some of the proposed house types will also benefit from integrated garage space (namely the Alderton, Beaumont, Stratford and Wentworth).

- 4.35. The proposed development and house types have taken account of the Council's guidance, and will ensure access for people of all abilities, as well as the safe movements of pedestrians and cyclists.

Waste and Recycling

- 4.36. Each of the proposed dwellings will have its own private bin storage area to aid waste collection and recycling.
- 4.37. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Statement to ensure that the internal road system can accommodate the safe manoeuvring of refuse vehicles. This has demonstrated that a refuse vehicle can enter and leave the Site in a forward gear.

Surface Water and Foul Drainage

- 4.38. The proposed development will incorporate the following drainage measures, as documented in the accompanying Flood Consequences Assessment (FCA) and Drainage Strategy:
- **Surface Water** – the Site does not benefit from any existing drainage and will rely on infiltration and surface water run-off to dispose of surface water flows. The flows will follow the topography towards the eastern end of the Site adjacent to Wrexham Road. Some of these flows will be intercepted by the watercourse in the southern end of the Site. The surface water drainage strategy presented at Appendix 1 of the accompanying FCA and Drainage Strategy provides all attenuation within a communal SuDS infiltration basis located within the proposed area of public open space at the southern edge of the Site. Other measures could include individual plot soakaways, water butts, permeable paving and bio retention; these measures would need to be considered and agreed at the detailed design stage; and
 - **Foul Water** – it is proposed to discharge all foul flows into the existing 150mm diameter combined sewer in Wrexham Road to the east of the Site, subject to receiving approval from Welsh Water.

Environmental Sustainability

- 4.39. The proposed development has the potential to generate sustainability benefits. The sustainable location of the Site and the availability of alternative modes of transport, together with the pedestrian and cycle permeability offered within the Site, should encourage non-car travel. Likewise, the new tree and hedgerow landscaping to be delivered as part of the proposed

development has the potential to make a positive contribution to the biodiversity value of the Site over time.

- 4.40. As a long-established North Wales housebuilder, the Applicant promotes energy efficiency within their homes; indeed, on average these are six times more efficient and generate over 60% fewer carbon emissions than older properties. As a commitment to energy efficiency, features include efficient heating systems, double glazing, insulated flooring, and a high standard of roof and wall insulation.

5 PLANNING POLICY CONTEXT

- 5.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 11 (“PPW11”) published in February 2021.
- 5.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

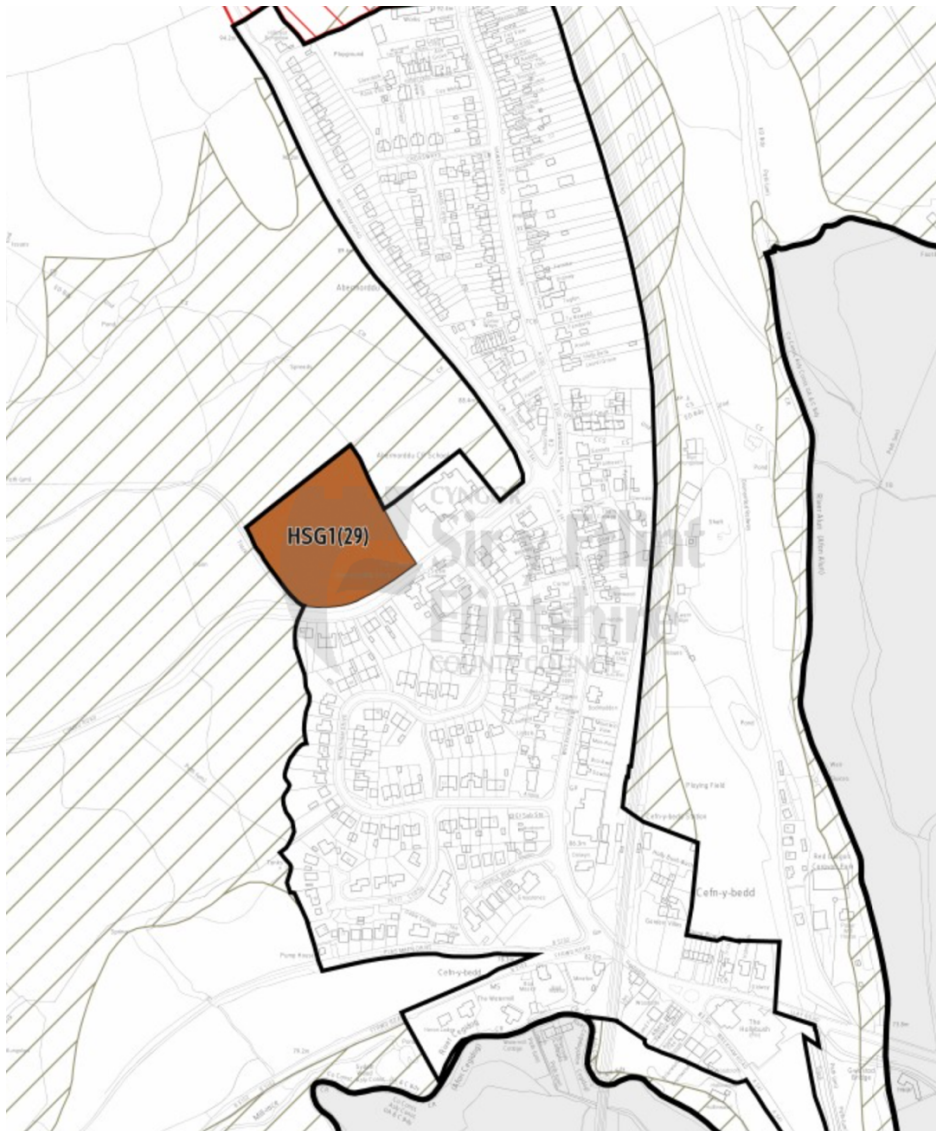
Local Development Plan

- 5.4. The development plan for the purposes of this Application comprises the following:
 - Flintshire Unitary Development Plan covering the period 2000 to 2015 (adopted in 2011); and
 - Emerging Replacement Flintshire Local Development Plan covering the period 2015 to 2030.

Adopted Local Development Plan

- 5.5. On the adopted Unitary Development Plan Proposals Map, the Site is designated as shown on Figure 4 below:
 - **Policy GEN3** – Development Outside Settlement Boundaries
 - **Policy MIN8** – Minerals Safeguarding Area

Figure 4: Flintshire Unitary Development Plan Proposals Map Extract



- 5.6. Abermorddu is identified as a Semi-Urban / Main Village in Table 1 (Housing Chapter) of the Unitary Development Plan.

Local Development Plan

- 5.7. In addition to those policies cited above, the following Unitary Development Plan policies are considered to have some relevance in the determination of this Application, and are considered further in Section 6 of this Statement:

Table 2: Relevant Unitary Development Plan Policies

Policy Reference	Policy Title
STR1	New Development
STR4	Housing
STR7	Natural Environment
STR8	Built Environment
STR9	Welsh Language and Culture
STR10	Resources
GEN1	General Requirements for New Development
GEN3	Development Outside Settlement Boundaries
GEN6	Welsh Language and Culture
D1	Design Quality, Location and Layout
D2	Design
D3	Landscaping
TWH1	Development Affecting Trees and Woodlands
WB1	Species Protection
AC13	Access and Traffic Impact
AC18	Parking Provision and New Development
HSG4	New Dwellings outside Settlement Boundaries
HSG8	Density of Development
HSG9	Housing Mix and Type
HSG10	Affordable Housing
SR5	Outdoor Play Space and New Residential Development
L1	Landscape Character
EWP3	Renewable Energy in New Development
EWP12	Pollution
EWP13	Nuisance
EWP14	Derelict and Contaminated Land
EWP16	Water Resources
EWP17	Flood Risk
RE1	Protection of Agricultural Land

- 5.8. Consistent with the Welsh Government advice as contained in the letter dated 24th September 2020, in the absence of an up-to-date Local Development Plan (LDP), plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.
- 5.9. Whilst this is the case in Flintshire, the UDP Plan period expired in 2015 with much of the evidence based underpinning it now being significantly out-of-date. As such, the UDP strategy, including settlement limits, are fundamentally out-of-date and this has been confirmed in a number of Appeal decisions. Whilst a starting point for the consideration of planning applications, some of these policies can no longer attract full weight, particularly when one considers the now very advanced status of the Replacement LDP as documented below.

Replacement Flintshire Local Development Plan

5.10. To date, Flintshire County Council has made the following progress on its Replacement LDP:

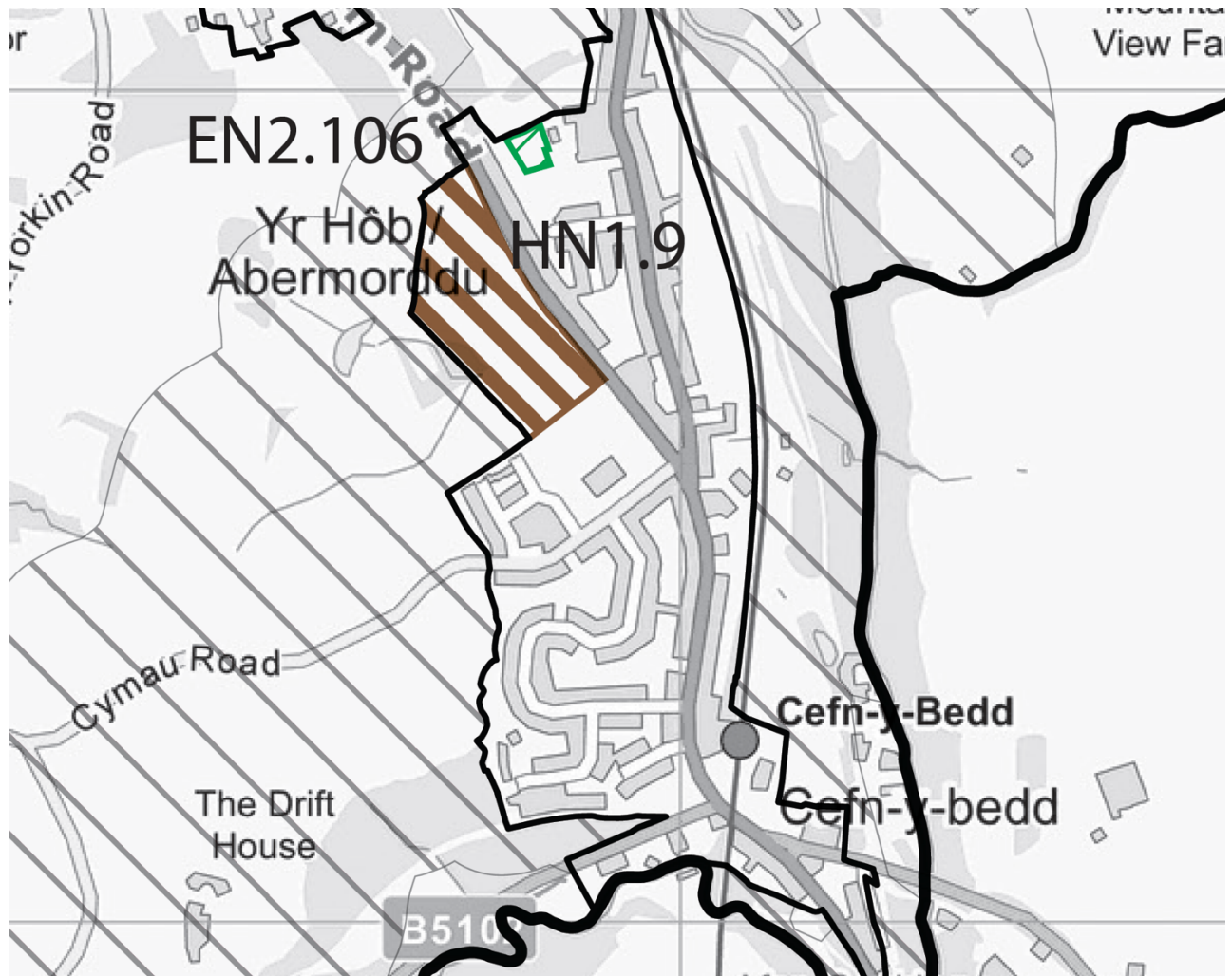
Table 3: Progress on Replacement Flintshire LDP

Stage in Plan-Making Process	Timescales
Consultation on Strategic Options	October 2016
Consultation on Preferred Strategy	November 2017
Consultation on Deposit LDP	September 2018
Examination in Public	April – May 2021
Main Modifications Consultation	June-July 2022

- 5.11. Consultation on the Main Modifications to the emerging LDP took place in June-July 2022, following the Examination in Public Hearing Sessions during 2021.
- 5.12. Accordingly, the Replacement LDP is now at a very advanced stage and thus is considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP will be adopted prior to the determination of this Application.
- 5.13. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application for 70 no. dwellings.
- 5.14. To this end, the emerging LDP identifies a requirement for 6,950 new homes to be built between 2015 and 2030, at a rate of 463 dwellings per annum. Policy HN1 of the emerging LDP identifies allocations for housing, including the Site subject to this Application for 80 dwellings (Site Reference. HN1.9), as shown on the emerging LDP Policies Map extract at Figure 5 below. The Site is also proposed to lie within the amended settlement boundary of Abermorddu. Development on the Site is required to retain hedgerows, create an attractive development frontage, and a layout which is sensitive to wildlife and the slope to the western edge of the Site.

- 5.15. Taking the above into account, and the need to deliver new market and affordable housing in Flintshire County, the very fact that the Site is a proposed housing allocation in the emerging LDP is considered to weigh heavily in favour of the proposed development.

Figure 5: Replacement Flintshire LDP Proposals Map Extract



- 5.16. Abermorddu is identified as a Tier 2 Local Service Centre under Policy STR2 of the Replacement LDP.
- 5.17. In addition to those policies cited above, the following emerging LDP policies are considered to be pertinent in the determination of this Application, and are considered further in Section 6 of this Statement:

Table 4: Relevant Emerging Flintshire Local Development Plan Policies

Policy Reference	Policy Title
STR1	Strategic Growth
STR4	Principles of Sustainable Development, Design and Placemaking
STR5	Transport and Accessibility
STR6	Services, Facilities and Infrastructure
STR11	Provision of Sustainable Housing Sites
STR13	Natural and Built Environment, Green Networks and Infrastructure
STR14	Climate Change and Environmental Protection
STR15	Waste Management
PC1	The Relationship of Development to Settlement Boundaries
PC2	General Requirements for Development
PC3	Design
PC4	Sustainability and Resilience of New Development
PC5	Transport and Accessibility
PC6	Active Travel
HN2	Density and Mix of Development
HN3	Affordable Housing
EN2	Green Infrastructure
EN6	Sites of Biodiversity Importance
EN7	Development Affecting Trees, Woodland and Hedgerows
EN14	Flood Risk
EN15	Water Resources
EN18	Pollution and Noise

Planning Policy Wales 11

- 5.18. PPW11 is a material consideration in planning decisions. PPW11 sets out the Welsh Government's approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental* and *cultural well-being* of Wales, and proposals should seek to promote sustainable development.
- 5.19. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.
- 5.20. Within PPW11, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 5.21. Placemaking features strongly within PPW11, identified as a holistic approach to the planning and design of development and spaces. This encourages high-quality development, with major developments creating new places.

-
- 5.22. Chapter 3 of PPW11 identifies the need to encourage and support the use of the Welsh language. Development proposals should consider the likely impact on the Welsh language and is a material planning consideration. It also seeks to protect the best and most versatile agricultural land unless there is an overriding need for its development.
- 5.23. Chapters 3 and 4 of PPW11 look at locational sustainability. New development should be accessible by walking and cycling, and well-served by public transport, as alternatives to the private car. New development should be located such that it minimises the need to travel and reduces dependency on the private car.
- 5.24. Chapter 4 of PPW11 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council's Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing delivery in each Authority area. Accurate information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review. Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.
- 5.25. Planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable. Paragraph 4.2.25 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.26. Chapter 6 requires development proposals to take account of the wildlife or landscape value of an area (including safeguarding protected species), and states that it is important to balance conservation objectives with the wider economic needs or local businesses and communities. Landscape value is identified as an intrinsic part of PPW11, and consideration should be given at the outset to any landscape value such that the wellbeing needs can be achieved. The provision of green infrastructure is encouraged, and the quality of the built environment should be enhanced by integrating green infrastructure into new development.
- 5.27. Chapter 6 also covers matters relating to flood-risk and drainage. PPW11 is clear that new development should reduce and not increase the risk of flooding; to this end, Local Planning Authorities are encouraged to work closely with Natural Resources Wales, drainage bodies, sewerage undertakers and relevant authorities in the determination of planning applications. This process should ensure that surface water run-off is controlled as near to the source as possible through the use of sustainable urban drainage systems ("SUDS"), ensuring that development does

not increase flooding elsewhere by the loss of flood storage/flood flow route, or increase the problem of surface water run-off. Paragraph 6.6.17 requires that development of one or more dwellings also require approval from the SuDS Approval Body ("SAB") before construction can commence. This is designed to ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

Technical Advice Notes (TAN)

5.28. Alongside PPW11, a number of Technical Advice Notes ("TAN") have been prepared by the Welsh Government. Those of relevance to the determination of this Application comprise the following:

- TAN2 – Planning and Affordable Housing
- TAN5 – Nature Conservation and Planning
- TAN11 - Noise
- TAN12 – Design
- TAN15 – Development and Flood Risk
- TAN16 – Recreation and Open Space
- TAN18 – Transport
- TAN20 – Planning and the Welsh Language
- TAN24 – The Historic Environment

Other Material Planning Considerations / Evidence Base Documents

5.29. Flintshire County Council has published a number of other material planning considerations and evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

Housing Land Supply

5.30. Technical Advice Note 1 (which formerly set out the requirement for Local Planning Authorities to demonstrate a five-year housing land supply) was revoked on 26th March 2020. Accordingly, the weight to be afforded to a shortfall in housing land supply is a matter for the decision-taker.

5.31. The Council's latest stated housing land supply position is set out in the Housing Land Supply and Delivery Paper published in February 2021, with the supply position as of 1st April 2020.

5.32. Table 5A, as shown below, projects that the Council will deliver 3,320 dwellings between 2020-2025, at an average of 664 dwellings per year. This compares to the average of 522 dwellings per

year between 2015 and 2020, which covered the first five years of the emerging Replacement LDP Plan period (and 420 dwellings per annum over the last 10 years).

Table 5: Housing Completions in Flintshire 2015/16 to 2019/20 and Future Projections

	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30
Completions (large)*	575	319	504	381	377										
Completions (small)*	87	102	104	73	87										
Allocated sites						196	190	408	512	448	395	358	298	255	240
Committed sites						304	333	222	138	89	36	37	30	32	0
Large windfall						0	0	60	60	60	60	60	60	60	60
Small windfall						60	60	60	60	60	60	60	60	60	60
TOTAL	662*	421*	608*	454*	464*	560	583	750	770	657	551	515	448	407	360

*Actual completions

5.33. As part of this delivery trajectory, Appendix 3a of the Council’s Housing Land Supply and Delivery Paper published in February 2021 makes an allowance for the Site subject to this Application to come forward for development between 2023-34 and 2025-26, delivering in the region of 80 no. dwellings.

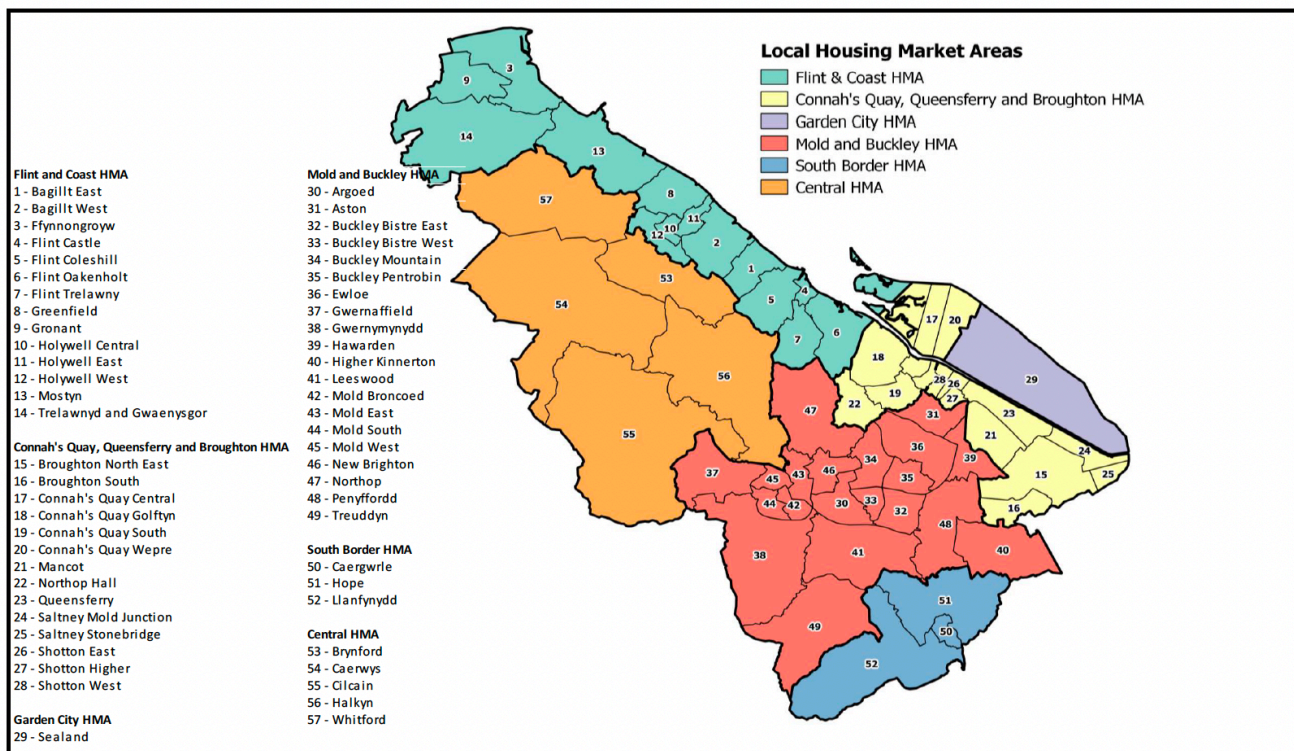
Local Housing Market Assessment (LHMA)

5.34. The Council’s most recent Local Housing Market Assessment (LHMA) was published in August 2015.

5.35. This identifies an annual shortfall of 238 affordable homes across Flintshire, with an identified need for 1 and 2 bedroom homes (45.6%), 3 bedroom homes (28.3%), and 4 bedroom homes (12%). Older persons stock equated to 14.1%.

5.36. The LHMA identifies 6 Housing Market Areas in Flintshire, as shown below:

Figure 6: LHMA's in Flintshire



- 5.37. Abermorddu is identified as lying within the Southern Border Housing Market Area.
- 5.38. The LHMA has identified an annual imbalance/surplus of 7 affordable dwellings per year in the Southern Border HMA.
- 5.39. Within the LHMA, Table 5.7 sets out recommendations on the housing mix that should be sought as part of new developments by type and size, as shown below:

Figure 7: Housing Mix in LHMA

Table 5.7 Open market dwelling stock and preferences			
Dwelling type/size summary	% Profile of new dwelling stock based on:		
	Current stock	Like	Expect
House 1/2 Beds	12.7	11.7	20.2
House 3 Beds	43.0	26.2	28.8
House 4 or more Beds	22.3	26.7	17.9
Bungalow	17.2	29.6	24.5
Flat	4.2	5.7	8.2
Other	0.7	0.0	0.3
Total	100.0	100.0	100.0
<i>Base</i>	53,825	8,738	7,628

Source: 2014 Household Survey

- 5.40. More recently, the Council published its Affordable Housing Prospectus (Draft) in July 2021. This sets out the general needs for social rent and intermediate affordable housing across the County as demonstrated via SARTH and Tai Teg.
- 5.41. This has identified that the highest demand for affordable housing in Flintshire is 1-bedroom properties, followed by 2-bedroom homes, with an increasing demand for 4-bedroom homes.
- 5.42. The areas with the most significant demand in Flintshire are Mold and Mynydd Isa, Connah's Quay, Shotton, Flint, Buckley and Queensferry.

Local Planning Guidance Notes

- 5.43. Flintshire County Council has published the following Guidance Notes which are considered relevant in the determination of this Application:
- Supplementary Planning Guidance Note 2 – Space Around Dwellings (January 2017)
 - Supplementary Planning Guidance Note 3 – Landscaping (January 2017)
 - Supplementary Planning Guidance Note 4 – Trees and Development (January 2017)
 - Supplementary Planning Guidance Note 9 – Affordable Housing (January 2017)
 - Supplementary Planning Guidance Note 11 – Parking Standards (January 2017)
 - Supplementary Planning Guidance Note 12 – Access for All (January 2017)
 - Local Planning Guidance Note 13 – Open Space Requirements (April 2006)
 - Supplementary Planning Guidance Note 23 – Developer Contributions to Education (January 2017)
 - Supplementary Planning Guidance Note 29 – Management of Surface Water for Development (January 2017) (now superseded by the National Standards for Sustainable Drainage).
- 5.44. Compliance of the proposed development with these Guidance Notes is considered in Section 6 of this Statement.

6 TECHNICAL AND POLICY ASSESSMENT

- 6.1. This Section of the Statement assesses the proposed development against the relevant policies of the development plan (adopted and emerging), and other material considerations, as documented in Section 5.

Principle of Development

- 6.2. As documented in Section 5 of this Statement, the Site is currently shown on the adopted UDP Proposals Map as lying outside but adjacent to the settlement boundary of Abermorddu, in a Minerals Safeguarding Area. Its development would therefore be contrary to Policy GEN3 of the UDP. However, as set out in Section 5 of this Statement, the Plan period for the UDP expired back in 2015, and is now long out-of-date. This includes the settlement limits shown on the UDP Proposals Map, and which are controlled by Policy GEN3. Accordingly, the weight to be afforded to these policies is severely diminished, and the UDP settlement limits have been found to be out-of-date in a number of previous Appeal decisions across the County.
- 6.3. Flintshire County Council is now well-advanced with the preparation of its Replacement LDP. Indeed, consultation on the Main Modifications to the emerging LDP took place in June-July 2022, following the Examination in Public Hearing Sessions during 2021. The Replacement LDP is now at a very advanced stage and is therefore considered to be capable of attracting significant weight in the determination of this Application. Indeed, there is the possibility that the Replacement LDP could be adopted prior to the determination of this Application.
- 6.4. Both the Development Management Manual (DMM) and the Development Plans Manual (DPM) advise that certainty regarding the context of an LDP will only be achieved when the LDP Inspectors deliver their binding report. However, paragraph 9.4.9 of the DMM does acknowledge that the evidence underpinning an emerging LDP can be used as a material planning consideration when making planning decisions. Paragraph 7.5 of the DPM is also clear that where an LDP is in preparation, refusing planning permission on grounds of prematurity will not usually be justified except in cases where a development proposal goes to the heart of a plan and is individually or cumulatively significant. That is not considered to be the case in respect of this Application.
- 6.5. To this end, the emerging Replacement LDP identifies a requirement for 6,950 new homes to be built between 2015 and 2030, at a rate of 463 dwellings per annum. Policy HN1 of the emerging LDP identifies allocations for housing, including the Site subject to this Application for 80 dwellings (Site Reference. HN1.9), as shown on the emerging Replacement LDP Policies Map extract at Figure 5 of this Statement. The Site is also proposed to lie within the amended settlement boundary of Abermorddu under Policy RD1 of the emerging Replacement LDP.

- 6.6. Taking the above into account, and the need to deliver new market and affordable housing in Flintshire County, the very fact that the Site has been proposed for allocation in the emerging Replacement LDP is considered to weigh heavily in favour of the proposed development. The proposed development of 70 no. dwellings, 10 dwellings below the indicative allocation figure, will make a valuable and much-needed contribution to market and affordable housing delivery in Flintshire in line with the Replacement LDP housing trajectory, and the proposed development of 70 no. dwellings would not be premature to that very emerging Replacement LDP.
- 6.7. Appendix 3a of the Council's Housing Land Supply and Delivery Paper published in February 2021 makes an allowance for the Site subject to this Application to come forward for development between 2023-34 and 2025-26, delivering in the region of 80 no. dwellings. It is therefore acknowledged as making a valuable contribution to the Council's forward housing trajectory and supply.
- 6.8. The proposed development will provide for the efficient use of the land whilst delivering a mix of house types which respond to local housing needs, delivering predominantly a range of 1 to 3 bedroom homes. It will not lead to unsustainable and harmful development.
- 6.9. In summary, the principle of residential development on the Site is considered to be supported by and consistent with Policy HN1 of the emerging Replacement LDP and the evidence underpinning it, as a material planning consideration consistent with paragraph 9.4.9 of the DMM. It also aligns with Policies STR1 and STR2 of the emerging Replacement LDP. This is considered to outweigh any conflict with Policies GEN3 and MIN8 of the adopted UDP, the weight to be afforded to which in the determination of the is Application is now severely diminished.

Housing Mix, Affordable Housing and Density

- 6.10. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:
- 14 no. 2-bed mid-end terraced properties (Affordable Homes);
 - 6 no. 3-bed end terraced properties;(Affordable Homes);
 - 1 no. 3-bed end terraced corner property (Affordable Home);

 - 37 no. 3-bed properties (Open Market Homes); and
 - 12 no. 4-bed detached properties (Open Market Homes);

- 6.11. The proposed development will incorporate 21 affordable homes, equating to 30% of the total number of dwellings consistent with Policy HN3 of the emerging Replacement LDP insofar as it relates to development in the Southern Border HMA.
- 6.12. The affordable properties take the form of 2 and 3 bedroom homes, responding to the housing needs identified in the LHMA. It will assist with the annual imbalance/surplus of 7 affordable dwellings per year in the Southern Border HMA.
- 6.13. The affordable homes will be pepper-potted throughout the Site and indistinguishable in appearance from the market homes. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.14. As documented in Section 5 of this Statement, Table 5.7 of the LHMA sets out recommendations on the housing mix that should be sought as part of new developments by type and size, repeated again below:

Figure 8: Housing Mix in LHMA

Table 5.7 Open market dwelling stock and preferences			
Dwelling type/size summary	% Profile of new dwelling stock based on:		
	Current stock	Like	Expect
House 1/2 Beds	12.7	11.7	20.2
House 3 Beds	43.0	26.2	28.8
House 4 or more Beds	22.3	26.7	17.9
Bungalow	17.2	29.6	24.5
Flat	4.2	5.7	8.2
Other	0.7	0.0	0.3
Total	100.0	100.0	100.0
<i>Base</i>	53,825	8,738	7,628

Source: 2014 Household Survey

- 6.15. As part of the proposed development, the overall housing mix comprises the following:
- 20% 2-bedroom mid/end terraced homes;
 - 63% 3-bedroom end terraced and detached homes; and
 - 17% 4-bedroom detached homes.
- 6.16. The proposed housing mix does include a larger percentage of 3-bedroom properties than recommended in the table above. However, this is considered to be reflective of market demand post the Covid-19 pandemic, with more people now seeking an extra bedroom in a 3-bedroom property to afford greater flexibility for home-working.

- 6.17. As an established North Wales housebuilder, the Applicant has received interest from a number of parties seeking a new property across North Wales.
- 6.18. Over the last 12 months, the Applicant has recorded the following levels of interest:
- 13 no. enquiries for 2-bedroom homes;
 - 38 no. enquiries for 3-bedroom homes; and
 - 92 no. enquiries for 4-bedroom homes.
- 6.19. The Applicant has not received any enquiries for 1-bedroom homes. Whilst there is understood to be some need for 1-bedroom homes, this has not been reflected in the market demand experienced by the Applicant.
- 6.20. The Covid-19 pandemic has had a significant impact on people's daily lives, perhaps most notably their working patterns and location. This is not something which was naturally factored into the LHMA when published, pre-pandemic, and thus is now something of a limitation of that particular evidence base.
- 6.21. The pandemic has triggered a significant shift in people's housing/accommodation needs, with the requirement for extra space from which to work at home now a new and important consideration. This includes additional space for a home office/study, which typically takes the form of an extra-bedroom.
- 6.22. Accordingly, those people previously seeking a 2-bedroom property will now be seeking a three-bedroom property, and so forth, subject to availability and cost. It is therefore crucial that the housing market responds to these needs, both now and in the future. It is not considered to be 'good, positive planning' to simply focus on meeting historic needs, which no longer reflect the significant social changes which have now taken place in since the LHMA was produced. Such an approach would be counter-intuitive. The Applicant is therefore firmly of the view that the demand for more living space must be reflected in the housing mix which is presented as part of the proposed development.
- 6.23. The proposed net density across the Site will be 33.92 dwellings per hectare taking account of the Site's location, surroundings, configuration and wider policy requirements (including open space and landscaping/buffer). This also reflects the Site's proposed allocation under Policy HN1 of the emerging Replacement LDP.

- 6.24. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies HSG9 and HSG10, emerging Replacement LDP Policies HN2 and HN3, SPGN9, TAN2 and PPW11.

Layout and Design

- 6.25. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings and context, technical and policy requirements including accessibility (road widths, visibility splays, pedestrian linkages), topography, impact on trees/hedgerows/ecology, impact on heritage assets, and privacy/amenity (of nearby existing residential properties).
- 6.26. This has informed the careful preparation of a Proposed Site Plan which will have sought to limit as much as possible the impact on existing trees and hedgerows within and surrounding the Site. The layout maintains a permanent landscaped buffer to the adjacent Wildlife Site, whilst facilitating a new access to the Public Right of Way beyond the western boundary and a footpath connection to the local equipped area of play to the south-west. It will provide for a sustainable and logical extension to the settlement.
- 6.27. The creation of two-storey dwellings on the Site is considered appropriate having regard to the Site's surrounding context, the prevailing local character, and its physical characteristics. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards in SPGN2.
- 6.28. The house types, plot sizes and palette of materials have been designed to provide for the efficient use of land, whilst delivering high-quality accommodation and a high-quality living environment which raises the standard of design in the immediate locality but at the same time is reflective of the local character. The layout also provides for the natural surveillance of properties and public spaces/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents. There are no blank wall elevations onto any open public realm.
- 6.29. The proposed net density across the Site will be 33.92 dwellings per hectare; this is considered to be acceptable taking account of the guidance contained in UDP Policy HSG8 and emerging Replacement LDP Policy HN2, both of which seek a minimum density of 30 dwellings per hectare, and the wider policy requirements to be met across the Site.
- 6.30. Each property is designed to allow for access by people of all abilities consistent with the Council's Access for All guidance in SPGN12.

- 6.31. Based on emerging Replacement LDP Policy HN1, development on the Site is required to retain hedgerows, create an attractive development frontage, and a layout which is sensitive to wildlife and the slope to the western edge of the Site. These will all be achieved through this Application.
- 6.32. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GEN1, D1, D2, HSG8 and STR8, emerging Replacement LDP Policies STR4, STR13, PC2, PC3, PC4 and HN2, SPGN2 and SPGN12, TAN12, and PPW11.

Agricultural Land Quality

- 6.33. Based on the Welsh Government's Predictive Agricultural Land Classification Mapping, the Site comprises a mix of Grade 2 and Subgrade 3b land.
- 6.34. Accordingly, Policy RE1 of the UDP requires a demonstration that there is an overriding need for the proposed development, and where it cannot be accommodated on lower grade agricultural land.
- 6.35. To this end, the proposed housing allocation of the Site under Policy HN1 of the emerging Replacement LDP confirms that a) the development of the Site is required such that the identified housing needs of Flintshire County during the Replacement LDP Plan period up to 2030 (and we are already well into this Plan period), and b) the loss of the land for agricultural purposes and its residential land-use has been assessed and accepted by Flintshire County Council as part of the Replacement LDP plan-making process. It is not therefore possible for the development needs of the County to be met on lower grade agricultural land, effectively confirmed by virtue of its proposed housing allocation.
- 6.36. Accordingly, the loss of best and most versatile agricultural land is not considered to constitute a defensible or reasonable ground for refusal of the Application and the proposed development would not conflict with UDP Policy RE1 (the weight to be afforded to which is somewhat diminished owing to the out-of-date development limits), and PPW11.

Trees and Hedgerows

- 6.37. An Arboricultural Impact Assessment (AIA) has been undertaken across the Site and is submitted with the Application.
- 6.38. The proposed development has sought to retain existing tree and hedgerow planting, as well as providing compensatory/additional soft landscaping.
- 6.39. In doing so, it has been established that the following trees and hedgerows will need to be removed from the Site to accommodate the proposed development:

- T1; (Category C2)
- T3 (Category C2)
- G1 (in part); (Category B2/C2)
- G2 (Category C2)
- G3 (Category C2)
- G6 (in part) (Category B/C2)
- G8 (in part) (Category C2)
- H1 (in part) (Category C2)

- 6.40. As can be seen above, no Category A species are to be removed to facilitate the proposed development.
- 6.41. In addition to the above, the AIA has assessed the potential for the proposed development to impact on other retained trees and hedgerows. This includes a number of additional trees/groups of trees as listed in Table 1 of the AIA, owing to issues relating to the provision of new hard surfaces/services, the construction of new buildings, pruning requirements, and indirect physical impacts.
- 6.42. Tree protection measures are proposed to minimise/mitigate the impact of the proposed development on these species, namely tree protection fencing to be erected prior to the commencement of development. Such measures can be secured through an Arboricultural Method Statement which can be secured by way of planning condition.
- 6.43. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies STR7 D3, TWH1, emerging Replacement LDP Policies STR13, STR14, EN2 and EN7, SPGN3 and SPGN4, TAN5, and PPW11.

Landscaping and Public Open Space

- 6.44. As documented in Section 4 of this Statement, Landscape Plans have been prepared and are submitted with the Application; these set out the Applicant's intentions to provide new and compensatory tree and hedgerow planting across the Site. They also provide details of the proposed boundary treatments within and at the perimeter of the Site.
- 6.45. As set out above, existing trees and hedgerows are only proposed to be removed where they are required in order to secure vehicular and pedestrian connections, and to facilitate the proposed development as whole (including new hard surfaces and built form).
- 6.46. As detailed in Section 4 of this Statement, public open space will be provided in the southern parcel of the Site. This will include an attenuation basin as part of the surface water drainage strategy.

Footpath connections will be provided through this space from the Site to the adjacent equipped area of play that was delivered as part of the nearby Llys Clark residential development; accordingly, no additional equipped areas of play are proposed within the Site. The relationship between the proposed development, the proposed open space, and the existing equipped area of play is shown on Drawing Ref. ABMRD-SP.01 Rev. B submitted for approval.

- 6.47. Details relating to the maintenance of the public open spaces can be secured by way of a planning obligation.
- 6.48. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GEN1, D3, SR5 and L1, emerging Replacement LDP Policies STR4, STR13, OC2, EN2, SPGN3 and LPGN13, TAN16, and PPW11.

Highways and Road Safety

- 6.49. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for through the creation of a new access from Wrexham Road, designed to adoptable standards.
- 6.50. The proposed arrangements, including road and footpath widths, as described in Section 4 of this Statement are considered to be acceptable and will facilitate safe movements by vehicles (include refuge), pedestrians and cyclists of all abilities into and out of the Site, and through it, as well as providing safe connectivity to public spaces in the immediate surroundings. The proposed development should encourage and facilitate Active Travel as a result.
- 6.51. In respect of car parking provision within the Site, the standards which have been applied by the Applicant are broadly consistent with those set out by the Council in SPGN11.
- 6.52. The Transport Statement submitted with the Application has assessed the potential impacts of the proposed development on the local highway network and road safety.
- 6.53. In terms of trip generation, it has been established within Section 5 of the accompanying Transport Statement that the proposed development will generate the following:
- 9 vehicle arrivals, and 25 vehicle departures from the Site during the weekday AM peak hour; and
 - 24 vehicle arrivals and 10 vehicle departures from the Site during the weekday PM peak hour.

- 6.54. This proposed increase in traffic is not anticipated to have a material impact on the operation or safety of the local highway network. As such, there are no highway or transport related reasons to withhold planning permission for the proposed development. Furthermore, it is not considered that there is any requirement for any additional assessment of the local highway network.
- 6.55. As a condition of any planning permission, the Applicant is willing to accept the requirement to submit a Construction and Environmental Management Plan, and which will include details of construction traffic, site compound, contractor parking, and construction hours amongst others.
- 6.56. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies GEN1, AC13 and AC18, emerging Replacement LDP Policies STR4, STR5, STR6, PC5 and PC6, SPGN11 and LPGN12, TAN18, and PPW11.

Landscape and Visual Impact

- 6.57. The Site is not subject to any protected landscape designations and does not sit within an Area of Outstanding Natural Beauty. The acceptability of housing development on the Site is reflected through its proposed housing allocation under Policy HN1 of the emerging Replacement LDP.
- 6.58. Notwithstanding the above, the development of a greenfield parcel of land for housing will inevitably change the characteristics of the Site and the views into and out of it. However, the Proposed Site Plan has sought to provide for a layout which offers a natural transition to the countryside beyond to the west by retaining existing, well-established landscape features at the boundaries to the Site, and which will be strengthened by additional planting. To this end, the proposed development of the Site for 70 no dwellings, of no more than 2-storey in height, is not considered to cause unacceptable landscape and visual harm.
- 6.59. Accordingly, the proposed development is considered to respond positively to and is consistent with UDP Policies STR7 and L1, emerging Replacement LDP Policies STR13 and EN2, and PPW11.

Nature Conservation

- 6.60. A detailed Preliminary Ecological Appraisal (PEA) has been undertaken across the Site.
- 6.61. The PEA has assessed the Site for feature of ecological importance and in doing so, has considered the impacts of the proposed development on ecological habitats.
- 6.62. The PEA has established the following:

- No evidence of badger was recorded on or within 30m of the Site. However, it is recommended that a badger survey be undertaken of the Site and all habitats within 30m to search for the possible presence of badger setts;
- There are no records of Barn Owl activity on the Site. Tree T3, which is proposed to be removed, was found to be potentially suitable for roosting/nesting barn owl. It is recommended that this tree be inspected to determine its suitability;
- No bat roosts have previously been identified on the Site through surveys undertaken in 2016 and 2019. Tree T3 was deemed to have moderate bat roost suitability. It is recommended that Trees TN6 and T3 be subject to further assessment/inspection;
- Previous surveys in 2019 have found the Site to support a moderately diverse assemblage of relatively common bird species. Due to the proposed loss of existing scrubland and sections of hedgerows/treelines, impacts on local breeding bird populations are considered possible. It is therefore recommended that breeding bird surveys be undertaken on the Site. Furthermore, it is recommended that all preparation works including vegetation removal and building demolition be conducted between September and February, outside of the core bird nesting season;
- There are no ponds on the Site and the three waterbodies on the Site are considered to be unsuitable for Great Crested Newts. One off-site pond within 250m of the Site may have potential for Great Crested Newts; this pond was previously surveyed in 2016 and no evidence of Newts was identified. Given that this was over 5 years ago, it is recommended that an updated Survey of the off-site pond in question be conducted;
- Habitats on the Site were considered to offer hedgehog suitable foraging and shelter conditions. The proposed development has the potential to impact on hedgehogs. A series of measures are therefore recommended to minimise the impact of the proposed development on the hedgehog population;
- No invasive species have been identified on the Site; and
- It is unlikely that the Site is supporting Water Voles;

6.63. To the north and west of the Site lies undeveloped countryside. This comprises the Caeau Abermorddu Wildlife Site. The PEA recommends that appropriate buffers be maintained to the Wildlife Site, to be controlled via a Habitat Management Plan.

6.64. Accordingly, and subject to following recommendations set out in the Survey, the proposed development is considered to respond positively to and is consistent with UDP Policies STR7 and WB1, emerging Replacement LDP Policies STR13 and EN6, TAN5 and PPW11.

Heritage

6.65. As set out in Section 4 of this Statement, the nearest designated heritage assets to the Site are:

- **Caergwrle Castle**, a Grade I listed building located c. 280m from the northern boundary of the Site, lying to the north-east;
 - **Plas-yn-Bwl**, a Grade II* listed building located c. 370m from the northern boundary of the Site; and
 - **Gatepiers at Bryn Lorcyn Manor**, a Grade II listed building located c. 480m from the western boundary of the Site.
- 6.66. There will remain a physical and visual separation between the northern-most boundary of the Site and these heritage assets post-development (owing to intervening vegetation, topography and landform/land-uses); consequently, it is not considered that the proposed development of the Site would harm the setting and significance of these heritage assets.
- 6.67. Accordingly, the proposed development is considered to be consistent with UDP Policy STR8, emerging Replacement LDP Policy STR13, TAN24 and PPW11.

Flood-Risk and Drainage

- 6.68. As documented in Section 2 of this Statement, the Site lies in Flood Zone A. It is therefore deemed by Natural Resources Wales to be at a low risk of surface water, groundwater, fluvial and tidal flooding, as confirmed in the accompanying Flood Consequences Assessment and Drainage Strategy. The Site is also at low risk of flooding from artificial sources (reservoirs/canals/sewers).
- 6.69. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application (as set out in the accompanying Flood Consequences Report and Drainage Strategy). This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement.
- 6.70. It is acknowledged that it is now a requirement to take into account the impact of planning applications/developments on phosphate levels in all river Special Areas of Conservation. The proposed development is expected to drain to the Hope Waste Water Treatment Works which is understood to have the capacity to accommodate the scale of the proposed development and also has a phosphate licence in place. This may need to be re-assessed to establish if the more stringent controls can be met, and will be a matter for consideration by statutory consultees.
- 6.71. Accordingly, and subject to the recommendations set out in the FCA and Drainage Strategy, the proposed development is considered to respond positively to and is consistent with UDP Policies STR7, STR10, EWP16 and EWP17, emerging Replacement LDP Policies STR13, STR14, EN14, and EN15, TAN15 and PPW11.

Minerals Safeguarding and Contamination

- 6.72. As outlined in Section 5 of this Statement, part of the Site falls within an area identified for Minerals Safeguarding in the adopted UDP. This covers a wider area within which the Site sits. However, the weight to be afforded to Policy MIN8 is now diminished given that the UDP is time-expired and the evidence underpinning the policies contained within is out-of-date.
- 6.73. Furthermore, the Site is now a proposed housing allocation under Policy HN1 of the emerging Replacement LDP, through which the development of the Site and the loss of the land for minerals safeguarding has been tested and accepted.
- 6.74. Notwithstanding the above, the Site is understood to be located within a coal mining area, and thus The Coal Authority will be consulted on the Application as a statutory consultee.
- 6.75. Given the nature of the Site as undeveloped greenfield land, it is not considered to pose any risk of ground contamination such that the proposed land-use and future occupiers would be vulnerable.
- 6.76. Accordingly, the proposed development is not considered to conflict with the Local Development Plan (adopted and emerging) and PPW11 in this regard.

Welsh Language

- 6.77. As set out previously in this Statement, the Site is now a proposed housing allocation under Policy HN1 of the emerging Replacement LDP, through which the development of the Site for housing has been tested and accepted. As a result, the proposed development of the Site is not considered to cause harm to the Welsh language and would not conflict with UDP Policies STR9 and GEN6, emerging Replacement LDP Policies STR4 and STR6, TAN20 and PPW11.
- 6.78. Notwithstanding this, a number of enhancement measures could be considered which would support the local community and linguistic effects. These could include bi-lingual street names and signage, local advertisement/marketing of the properties, the preparation and submission of a Construction Method Statement, and a detailed lighting design.

Planning Conditions

- 6.79. As outlined within this Statement, the Applicant is willing to accept a number of planning conditions related to the proposed development where these satisfy the six tests set out in the Welsh Government Circular published in October 2014 and WGC 016/2014. These include, amongst others:

- Drainage (surface water and foul water);

- Materials;
- Affordable Housing;
- Construction and Environmental Management Plan;
- Tree protection measures (as per Arboricultural Method Statement);
- Reasonable avoidance measures;
- Habitat Creation Management Plan and Habitat Management Plan for buffer area to adjacent Wildlife Site; and
- Lighting.

Planning Obligations

6.80. The Applicant is committed to engaging in discussions with Officers at Flintshire County Council in relation to securing planning obligations where these satisfy the requirements set out in UDP Appendix 1, emerging Replacement LDP Policy STR6, and Regulation 122 of the Community Infrastructure Levy Regulations which require that:

- The obligations must be necessary to make the proposed development acceptable in planning terms;
- The obligation must be directly related to the proposed development; and
- The obligations must be fairly and reasonably related in scale and kind to the proposed development.

6.81. Any requests for financial contributions consistent with the aforementioned policy tests must be justified by up-to-date evidence. It is understood from the Council's pre-application guidance that obligations may be sought in relation to primary and secondary education, public open space, affordable housing, and off-site ecological provision.

7 CASE FOR DEVELOPMENT

7.1. Having regard to the Technical Assessment in Section 6 of this Statement, this Section goes on to consider the proposed development in the context of the overarching objectives of sustainable development as documented in paragraph 2.28 of PPW11.

Social Benefits

7.2. The proposed development will deliver the following **Social** benefits:

- The delivery of 70 new dwellings in Flintshire where there is an accepted need for new market and affordable housing in line with the Replacement LDP housing trajectory. The proposed development will involve the development of land allocated for housing in the emerging Replacement LDP, lying within the re-defined settlement limits of Abermorddu, the principle of which is now considered to be established and supported by virtue of the advanced status of the Replacement LDP (and the fact that we are well into the Plan period up to 2030). It will provide for a logical extension to the settlement of Abermorddu at its western edge;
- The delivery of 21 no. affordable homes, 30% of the proposed development, and which is a material planning consideration. These will comprise 2 and 3 bedroom homes reflecting the findings of the LHMA and which will be accessible by local people; and
- The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the Council's SPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW11.

Economic Benefits

7.3. The proposed development will deliver the following **Economic** benefits:

- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;
- Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;

- Annual Council Tax contributions to Flintshire County Council from the 70 no. proposed new dwellings;
- Gross Value Added to the local economy generated by future residents of the proposed development; and
- Potential planning obligations where these satisfy Regulation 122 of the CIL Regulations, including a financial contribution towards primary and secondary education.

Environmental Benefits

7.4. The proposed development will deliver the following **Environmental** benefits:

- Existing trees and hedgerows within and at the perimeter of the Site will be retained wherever possible. Landscaping, including new tree and hedgerow planting across the Site, provides the opportunity to achieve secure net gains in biodiversity whilst at the same time minimising the landscape and visual impacts of the proposed development;
- The proposed development is not likely to give cause to the loss of any features of significant ecological value, nor cause harm to any protected species, albeit further survey work is recommended. There will be no adverse impact on Caeau Abermorddu Wildlife Site. The proposed attenuation basin and public open space could provide the opportunity for enhanced biodiversity across the Site;
- The proposed surface water drainage measures which will not increase or exacerbate flood-risk or surface water run-off elsewhere;
- The creation of safe and adoptable access arrangements from Wrexham Road, and which will facilitate and encourage safe pedestrian and cycle movements by connecting to the existing network through the creation of new footway linkages;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling, provided for through new and safe linkages, consistent with the guidance criteria set out in Section 4 of the accompanying Transport Statement. Where the use of the private car is required, the proposed development will have a barely perceptible impact on the highway network and road safety;

- The proposed development will not have any adverse impact on the historic environment, including the setting and significance of nearby heritage assets;
- The proposed development will not create any adverse impacts in relation to noise, contamination and air quality/odour; and
- Construction of energy efficient homes using established techniques which the Applicant applies to all of its new-build properties.

Cultural Well-Being

7.5. The proposed development will deliver the following **Cultural** benefits:

- The Applicant recognises that the proposed development presents the opportunity for an overall positive community and linguistic impact. To this end, and if deemed necessary, they are willing to consider the provision of bilingual signage within the proposed development amongst other measures such that the proposed development has the potential for a positive community and linguistic impact;
- The proposed development will not cause harm to any existing heritage assets nor assets of cultural significance; and
- There is no evidence to suggest or support any view that the proposed development cannot be integrated within the settlement, and nor that it would impact on the safety and cohesion of the community. The Site is proposed to be allocated under Policy HN1 of the emerging Replacement LDP, and its suitability for residential development has been fully tested as part of the plan-making process including by independent Inspectors at the Examination in Public.

8 CONCLUSIONS

- 8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land off Wrexham Road, Abermorddu.
- 8.2. The description of development for which detailed planning permission is sought is:
- “Erection of 70 dwellings, construction of a new vehicular access, landscaping and associated works”***
- 8.3. This Statement has demonstrated that whilst the proposed development would conflict with Policy GEN3 of the adopted UDP, the latter is now time-expired together with the evidence underpinning it. The settlement limits set out in the UDP, controlled by Policy GEN3, are out-of-date as confirmed in previous Appeal decisions across the County. To this end, the emerging Replacement LDP and the evidence base underpinning it is a material consideration in the determination of this Application for the reasons set out in this Statement and which should be afforded significant weight given its advanced stage of preparation.
- 8.4. The principle of residential development on the Site is supported through its proposed housing allocation under Policy HN1 of the emerging Replacement LDP (Site Ref. HN1.9), and its location within the re-defined settlement limits of Abermorddu.
- 8.5. The proposed development will represent a logical extension to the settlement at its western edge delivering a balanced mix of much-needed, high-quality new market and affordable housing which provides for the efficient and sustainable use of the land. The proposed housing mix responds to need and market demand.
- 8.6. In respect of the technical considerations assessed in Section 6 of this Statement, the proposed development will not give cause to any negative adverse impacts. It satisfies the key policy and technical requirements set out in the LDP and other material considerations including the Council's SPGN's, and national planning policy contained in the Technical Advice Notes and PPW11.
- 8.7. As set out in Section 7 of this Statement, the proposed development will generate a number of economic, social, environmental and cultural well-being benefits consistent with the overarching objectives set out in PPW11.
- 8.8. In the overall planning balance, the proposed sustainable development is considered to be acceptable; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with the UDP (insofar as weight can still be afforded to some of its policies), the relevant policies of the very advanced emerging Replacement LDP and its evidence base as a material

planning consideration in the determination of this Application consistent with paragraph 9.4.9 of the DMM, and paragraph 1.18 of PPW11.

